

EXHIBIT 6

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STRIKE 3 HOLDINGS, LLC, a
Delaware corporation,

Plaintiff,

v.

JOHN DOE, subscriber assigned IP
address 73.225.38.130,

Defendant.

No. 2:17-cv-01731-TSZ

**PLAINTIFF'S OBJECTIONS AND
RESPONSES TO DEFENDANT'S
FOURTH SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Pursuant to Fed. R. Civ. P. 36, Plaintiff Strike Three Holdings, LLC ("Plaintiff") hereby responds and objects to the Fourth Set of Requests for Production of Documents propounded by Defendant John Doe, subscriber assigned IP address 73.225.38.130 ("Defendant") as follows:

PRELIMINARY STATEMENT

Plaintiff's responses to these Requests are based on its current knowledge, information, and belief. As Plaintiff is still in the initial stages of discovery, additional knowledge of facts and information may result from further discovery or investigation. It is

PLAINTIFF'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S FOURTH SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS

No. 2:17-cv-01731-TSZ – Page 1

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possible that there are additional facts which Plaintiff has been unable to determine and additional documents which Plaintiff has been unable to locate despite diligent efforts, and Plaintiff anticipates that additional facts may be determined and that additional documents may be located through further discovery, investigation and research. Such discovery efforts are ongoing. Accordingly, Plaintiff reserves the right to identify additional facts and documents, as well as the right to amend or supplement its responses to these Requests as this case progresses. Plaintiff further reserves all objections as to competency, relevance, materiality, privilege, or admissibility of its responses herein and any document or thing identified in these responses.

OBJECTIONS AND RESPONSES TO REQUESTS

FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 82:

Any and all communications by and between Strike 3 and “Sid” Singh, who was referenced in the depositions of Greg Lansky, Susan Stalzer, and John Pasquale.

RESPONSE:

Plaintiff objects on the basis that this request seeks documents that are neither relevant nor likely to lead to the discovery of admissible evidence. Plaintiff objects on the basis that this request seeks documents that fall under the attorney work product privilege and communications which are attorney client privileged. Plaintiff objects on the basis that this request seeks documents that are not proportional to the needs of the case. Plaintiff objects on the basis that this request is overly broad and unduly burdensome. Indeed, as written this request seeks any and all forms of Strike 3’s communication with Sid regardless of whether the communication falls outside of any relevant time period or whether the communication even pertains to this case. Since the request is so overly broad, a host of responsive documents are not remotely related to any material fact at issue in this case.

PLAINTIFF’S OBJECTIONS AND RESPONSES
TO DEFENDANT’S FOURTH SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS

No. 2:17-cv-01731-TSZ – Page 2

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1 Plaintiff further objects on the basis that this request seeks confidential business
 2 information pursuant to Fed. R. Civ. P. 26(c). The foregoing is confidential information
 3 which is not publicly known and provides both Strike 3 and Sid's company with a
 4 competitive advantage.

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 6 **REQUEST FOR PRODUCTION NO. 83:**

7 Any and all documents in your possession providing the name of "Sid" Singh's
 8 company, its location, and contact information for Mr. Singh.

9 **RESPONSE:**

10 Plaintiff objects on the basis that this request seeks documents that are neither
 11 relevant nor likely to lead to the discovery of admissible evidence. Plaintiff objects on the
 12 basis that this request seeks documents that fall under the attorney work product privilege
 13 and communications which are attorney client privileged. Plaintiff objects on the basis that
 14 this request seeks documents that are not proportional to the needs of the case. Plaintiff
 15 objects on the basis that this request is overly broad and unduly burdensome. Indeed, as
 16 written this request seeks any and all documents containing Sid's information and therefore
 17 includes potentially all of Strike 3's communication with Sid regardless of whether the
 18 communication falls outside of any relevant time period or whether the communication
 19 even pertains to this case. Since the request is so overly broad, a host of responsive
 20 documents are not remotely related to any material fact at issue in this case. Plaintiff further
 21 objects on the basis that this request seeks confidential business information pursuant to
 22 Fed. R. Civ. P. 26(c).

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 25
 26 **PLAINTIFF'S OBJECTIONS AND RESPONSES
 TO DEFENDANT'S FOURTH SET OF
 REQUESTS FOR PRODUCTION OF
 DOCUMENTS**

No. 2:17-cv-01731-TSZ – Page 3

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DATED this 19th day of June, 2019

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PLAINTIFF'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S FOURTH SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS

No. 2:17-cv-01731-TSZ – Page 4

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CERTIFICATE OF SERVICE

I, Lincoln Bandlow, hereby certify that on June 19, 2019, a true and correct copy of the foregoing document was served via email to the following:

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Attorneys for Defendant

DATED this 19th day of June 2019 at Los Angeles, California.

/s/ Lincoln Bandlow

Lincoln D. Bandlow

PLAINTIFF'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S FOURTH SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS

No. 2:17-cv-01731-TSZ – Page 5

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